

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SIEMENS MEDICAL SOLUTIONS USA, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 07-190 (SLR)
)	
SAINT-GOBAIN CERAMICS & PLASTICS, INC.,)	
)	
)	
Defendant.)	

JOINT PROPOSED VOIR DIRE

Pursuant to D. Del. L.R. 47.1(a), the parties jointly submit the following agreed-upon proposed *voir dire* to jury panel.

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August 27, 2008

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VOIR DIRE TO JURY PANEL

Good morning, ladies and gentlemen. I am Judge Robinson, and I will be presiding over the trial for which a jury is about to be drawn in this case captioned **Siemens Medical Solutions USA, Inc. v. Saint-Gobain Ceramics & Plastics, Inc.** This is a patent action arising under the patent laws of the United States.

The trial may last up to 7 days. I time my trials, so the attorneys have to complete their trial presentations within these limits. However, jury deliberations may require you to be present longer than the scheduled 7 days. Our trial days will run approximately from 9:30 a.m. to 4:30 p.m.

In light of this brief summary, I will ask you certain questions, the purpose of which is to: (1) enable the court to determine whether or not any prospective juror should be excused for cause; and (2) enable counsel for the parties to exercise their individual judgment with respect to peremptory challenges, that is, challenges for which no reason need be given by counsel. If any of you answer any question “yes,” please stand up and, upon being recognized by the Court, state your juror number. When I have concluded asking all the questions, we will call you to the bench individually to speak with you about your affirmative response or responses.

HAVE CLERK ADMINISTER THE OATH TO THE PANEL

1. You have been given a list of companies and organizations.
 - (a) Have you, a family member or close friend, ever worked for any of these companies or organizations?
 - (b) Do you or any member of your household now own, or have you or any such member ever owned, any stocks or bonds in any of those companies or organizations?
 - (c) Have you, any family member, or anyone close to you had any dealings with, or relied financially in any way on, any of the companies or organizations?

(d) Have you, any family member, or anyone close to you had any experience with the products of any of those companies or otherwise have any strong feelings, positive or negative, toward any of these companies or organizations?

2. You have been given a list of the attorneys and law firms involved in this litigation. Are you related to, or personally acquainted with, any of those attorneys, or have you ever been represented by any of those attorneys or other associates or members of the listed law firms?

3. You have been given a list of the individuals who might appear as witnesses in this case. Are you related to, or personally acquainted with, any of those individuals?

4. Do you have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it?

5. Have you ever been a plaintiff, a defendant, or a witness in a civil lawsuit?

6. Have you ever served as a juror in a civil lawsuit?

7. You have been given a list of subject areas. Have you, a close friend, or a family member ever been educated, employed, trained, or had any experience in any of the following limited areas?

8. Do you have any knowledge about or experience with patents, including applying for a patent?

9. Have you ever worked for a company that had patented products or processes?

10. Have you ever been involved in the development of a new product or process?

11. Have you, any member of your immediate family, or anyone close to you ever had any dealings with the United States Patent and Trademark Office?

12. Do you have any opinions about a patent granting exclusive rights to the inventors or their employer?

13. Do you believe it would be wrong for someone to profit from his invention or discovery?

14. Have you, any member of your immediate family, or anyone close to you ever alleged infringement of a patent or been alleged to have infringed a patent?

15. Have you ever worked for a company that has been alleged to have engaged in, or has alleged that another company has engaged in, infringement of a patent?

16. Do you hold an opinion, positive or negative, regarding foreign companies and/or their ability to sell their products in the United States, or to be subject to the patent laws of the United States.

17. Do you have any special disability or problem that would make it difficult or impossible for you to serve as a member of the jury in this case?

18. Do you know of anyone who has been in or operated a PET scanner?

19. Do you know of anyone who has been in a situation where they were responsible or liable for damages caused by another party?

20. Do you know of any other matter which you believe should be called to the court's attention as having some bearing upon your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?

COMPANIES

Schlumberger Technology Corporation
Siemens Medical Solutions USA, Inc.
Saint-Gobain Ceramics & Plastics, Inc.
Philips Medical Systems (Cleveland), Inc.
Crystal Photonics, Inc.

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SUBJECT AREAS

Chemistry or Materials Science
Crystal Detectors
Doctrine of Equivalents
Healthcare or Medicine
Lutetium Oxyorthosilicate (LSO)
Lutetium Yttrium Orthosilicate (LYSO)
Medical Imaging Devices
Patent Infringement
PET/CT Scanners
PET Scanners
Research & Development
Sales & Marketing
Scintillator Crystals
Accounting
Licensing

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